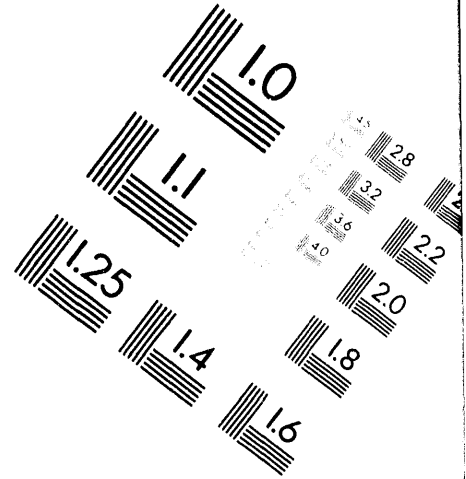
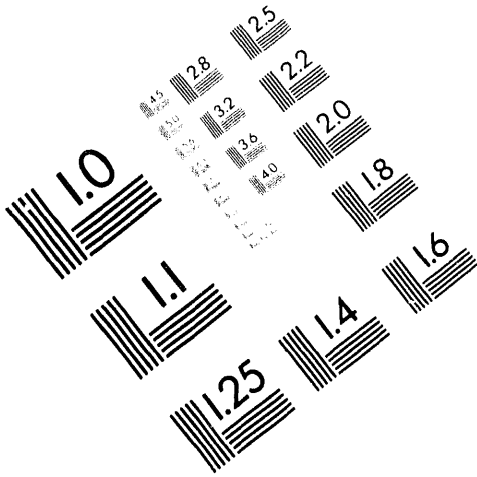




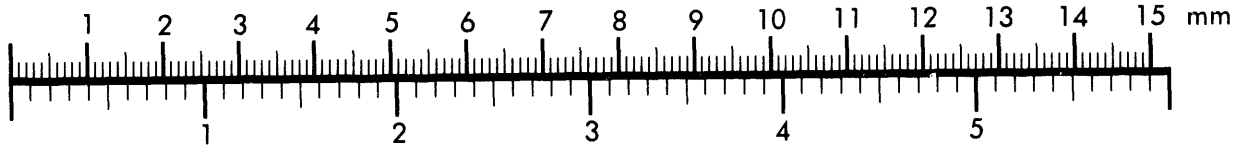
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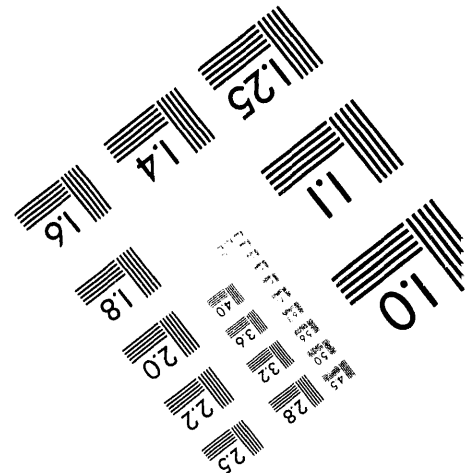
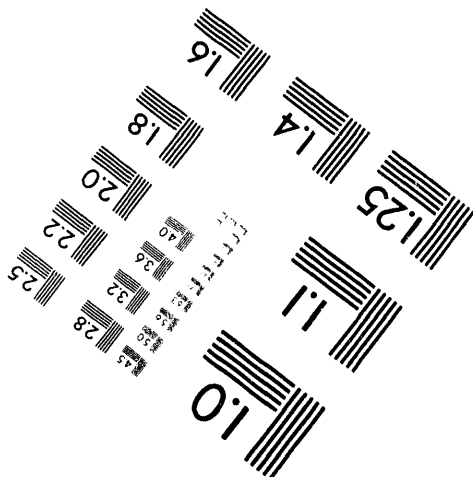
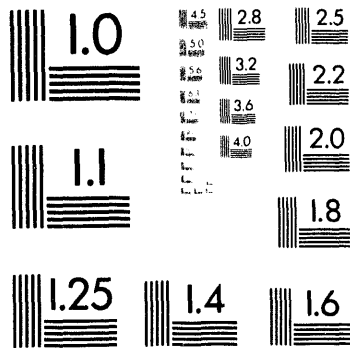
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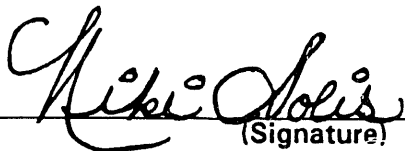
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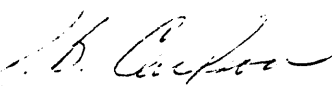
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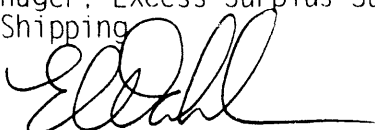
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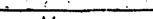

Approved by: G. B. Carlson
Manager, Excess Surplus Sales
& Shipping

5/30/94
Date


Approved by: E. C. Dahlin
Manager, Materials Management

5/31/94
Date

FINAL APPROVAL


D. K. Quigley, Manager
Procurement & Materials Management

6/1/94
Date

TRAINING PLAN FOR THE 1164 <90-DAY NON-RADIOACTIVE HAZARDOUS WASTE STORAGE BUILDING

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In accordance with Washington Administrative Code (WAC), Chapter 173-303, "Dangerous Waste Regulations," a written training plan is required for a <90-day accumulation area. WAC 173-303-200, "Accumulating Dangerous Waste on-site" requires compliance with WAC 173-303-330, Personnel Training. This training plan complies with WAC 173-303-330. This training plan, including the names of personnel in Table 1, may be given to a regulatory agency inspector upon request provided that this plan is cleared for public release. Training records associated with personnel identified in this plan are not to be given to an outside regulatory agency inspector unless prior approval by the specific individual is obtained. Training records requests by regulatory agency inspectors without the individual's approval are to be processed via a Freedom of Information Act request through the U.S. Department of Energy-Richland Field Office.

2.0 Training Program

A dangerous or mixed waste generator shall provide personnel training as directed by WAC 173-303-330. WHC Site Training is responsible for developing the program of classroom instruction. Facility managers are responsible for developing a program for facility specific training at their facility which supplements the classroom program. General requirements of a training program include:

- a. Teaching personnel to perform duties in compliance with the Dangerous Waste Regulations.
- b. Instruction by a person knowledgeable of dangerous waste management procedures and include training relevant to the employees position.
- c. A Facility Specific program that includes instruction to familiarize personnel with applicable procedures (Inspection Plans, operating procedures, etc), container management practices, spill response, and emergency procedures. Facility Specific Training must be given annually to personnel involved in operations of the 90-day accumulation area. An annual review of the Building Emergency Plan/Contingency Plan will satisfy the spill response and emergency procedures review. These requirements will be met in the following:
- d. New employees must receive training within 6 months of employment and must be supervised until completion of training.

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- e. Employees must participate in an annual review of training.

3.0 Training Plan Content Requirements

According to WAC 173-303-330(2) a training plan must contain:

- a. For each position related to dangerous waste management at the facility, the job title, the job description, and the name of the employee filling each job. The job description must include the requisite skills, education, other qualifications, and duties for each position.
- b. A written description of the type and amount of both introductory and continuing training required for each position.
- c. Records documenting that facility personnel have received and completed the training required by this section.

This information is provided or referenced in this Training Plan for all personnel involved with less than 90-day accumulation area management.

3.1 Job Title, Job Description, and Names of Employees

Table 1 of this Training Plan contains the employee names, and job title which are associated with dangerous waste management at the 90 day accumulation area. The job description contains four elements. One of which is contained in this Training Plan and the other three maintained by WHC Human Resources. WHC Human Resources maintains the requisite skills, education, and other qualifications associated with the employees position. Job titles and duties of employees associated with dangerous waste management at <90-day accumulation areas are listed below:

3.1.1 <90-day Accumulation area Emergency Coordinator.

Responsibilities and duties include:

- Operating and maintaining the <90-day accumulation area in compliance with U.S. Department of Energy directives, applicable policies and procedures, and local, state, and federal regulations.
- Complying with all dangerous waste policies, procedures, and regulations.

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- Recruiting and developing trained professionals, and exempt.
- Ensuring safe and disciplined operations by trained personnel who implement policies and procedures.
- Providing operational requirements for support organizations to plan and provide services and resources as applicable.
- Promoting safe operations at the <90 day accumulation area.
- Ensuring that the <90-day accumulation area operating procedures are developed, reviewed, approved, and revised as applicable.
- Responding to off normal and/or emergency conditions according to established procedures.
- Performing the duties of the Emergency Coordinator as defined in WAC-173-303-360, and understanding the impact of implementing the Contingency Plan for the <90-day accumulation area during emergencies.

3.1.2 Hazardous Material Specialist

This position has the responsibility for the proper procurement, handling, storage, transportation, and disposal of hazardous materials. Assure hazardous materials are identified, controlled, handled and disposed of in accordance with WHC policies and procedures, meeting all DOE orders, State, and Federal regulations.

3.2 Written Description of the Type and Amount of Training

3.2.1 Employees Dangerous Waste Work Category Classifications

The <90-day accumulation area employees are classified into one of two categories with respect to their job titles, positions, and responsibilities or involvement with dangerous waste management.

Table 2 is a general description of the duties associated with each worker category.

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3.2.2 Training Requirements

General Manager and General Shipper are the worker categories for the 1164 <90 Day accumulation area employee.

1. General manager/shipper

Are required to have the following courses:

- a. New Employee Orientation 02006A
- b. Hanford General Employee Training 000001 (Annually)
- c. Generator Hazard Safety Training 02006G
- d. Facility Emergency Hazard Information Checklist 03E920 (Annually)
- e. Core Waste Management Training Initial 035100
- f. Core Waste Management Training Refresher 035110 (Annually)
- g. Waste Management Administrative Initial 035120
- h. Waste Management Administrative Refresher 035130 (Annually)
- i. Waste Designation Support 035010 (Annually)
- j. D.O.T. Hazardous Waste Shipment Certification 020159 (Annually)

General Managers Only

- a. Environmental Compliance at Hanford 035050 (Refresher TBD)

See attachment A for additional information on the above mentioned courses.

3.3 Training Records

3.3.1 Location of Training Records

Official training record files for MESS employees are stored in the Training Records Information (TRI) system. The TRI system is managed by the Training Records organization. When a course is completed, the course roster, tests, and other documentation is sent to Training Records. Training records enters the training record onto the TRI system. The TRI system downloads current training records onto Soft Reporting. A Soft Reporting printout contains all current courses that Training Records accepts. Training Records will accept a training record for processing if a course number has been assigned and the appropriate documentation has been completed for that course. Training records for support organization employees also are stored in the

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Training Records Information system. WHC training records are stored on Soft Reporting, but under WHC's data base, not the TRI system. Training records on former employees are kept on the Training Records Information system for three years from the date the employee last worked at a SWM TSD Unit.

Original training records entered on the TRI System are maintained by the Training Records Department in Richland, Washington. Original and copies of both the TRI system and the field file are transferred quarterly to the Records Holding Facility in Richland, Washington. After approximately one year, the original training records are archived at the Federal Records Center in Seattle, Washington.

3.3.2 Access of Training Records

The computer training record can be accessed at any computer onsite which is connected to the Hanford Local Area Network (HLAN). The user must have a password to access Soft Reporting on HLAN. The SWM record specialists have access to Soft Reporting in addition to organizations that routinely escort regulatory inspectors. When a training record is requested on an inspection, Soft Reporting will be accessed, and the record provided to the inspector. The password for Soft Reporting can also be used to access the WHC training database. Training Records on former employees will not be available for normal users.

3.3.3 Determining Current Training Status

After a training record (e.g., Soft Reporting Printout) is obtained, the training record will be compared to this plan. If the training record concerns an Emergency Coordinator or one of the Hazardous Material Specialists, that person will be identified by name with each RCRA course tabulated for easy inspection within this plan.

3.3.4 Updating of the Training Plan

When new courses become available, this Training Plan will be revised. When personnel change in <90-day accumulation area operations, the Table 1 to this Training Plan will be updated. When the Emergency Coordinators change, contact Hanford Emergency Preparedness

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Table 1

Names and Job Titles of Personnel
Associated with the 1164 Building
90-day Accumulation Area

NAME	JOB TITLE	WORKER CATEGORY
G. B. Carlson	Primary Emergency Coordinator	General Manager
J. L. Demarest	Alternate Emergency Coordinator	General Shipper
J. L. Demarest	Hazardous Material Specialist	General Shipper
D. J. Finley	Storekeeper	General Worker
M. W. Bryant	Storekeeper	General Worker

TABLE 2. WORKER CATEGORIES

WORKER CATEGORIES	GENERATOR JOB DUTIES
GENERAL MANAGER	Manages, coordinates and directs general shippers in management of dangerous waste. Responsible for the accountability and directing of employees during dangerous waste emergency events. Must be trained to the same level as managed employees
GENERAL SHIPPER/HAZARDOUS MATERIAL SPECIALIST/GENERAL WORKER	Duties include the preparation and shipment of dangerous waste containers in compliance with applicable requirements. Directs general and advanced workers in dangerous waste management and/or transportation activities. Authorized individual for signing waste manifest, hazardous materials shipment records, and other associated shipment paperwork. Duties include the preparation of waste containers in compliance with applicable requirements.

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ATTACHMENT A

ENVIRONMENTAL TRAINING COURSES WHICH ARE

WAC 173-303 DRIVEN

The following course descriptions are for those courses conducted through WHC Environmental Training which are driven by the requirements of the Washington Administrative Code 173-303, Dangerous Waste Regulations. In addition to these courses, Facility or Job specific training in Dangerous Waste management is required depending on the duties of the individual.

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GENERATOR HAZARDS SAFETY TRAINING

Course #02006G

This four-hour course introduces workers to hazard communication, waste minimization, and waste management. It defines hazardous materials, reviews labeling requirements, and introduces Material Safety Data Sheets and key terms used in chemical safety. Basic concepts for working safely with chemicals and methods for waste minimization are covered. Information is presented through lecture, films, and group participation.

Topical Outline

- Hazardous Materials Overview
- Material Safety Data Sheets
- Waste Minimization
- Dangerous Waste Management
- Terminology

Who Should Attend: Those employees whose jobs involve handling, generating, packaging, storing or shipping hazardous materials and/or dangerous wastes are required to attend this course. In addition, managers with responsibility for the above functions or who oversee policies, procedures, or verbal instructions that relate to hazardous material management are required to attend. This course satisfies initial requirements for Hazard Communications training, under OSHA 1910.1200.

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CORE WASTE MANAGEMENT**Course # 035100****(and 4-Hour Refresher # 035110)**

This 16-hour class will take the participant through the basics in requirements of waste management, incorporating 40 CFR, WAC 173-303, DOE Orders, and Company Policy requirements. Included in this class are three practical exercises for hands-on experience in satellite area and 90 day area requirements, labpack (for dangerous waste) and labpack form (for mixed waste), and preparing packages for their proper destination.

Topical Outline

- Introduction
- Managing Containerized Waste
- Waste Minimization
- Requirements for Accumulation Areas
- Generating Facility Criteria
- Pre-shipment to Facility
- Acceptance for Disposal or Storage
- Summary of Requirements
- Transportation of Hazardous Materials

Who Should Attend: Those employees who are involved with waste management activities and require training per WAC 173-303, and/or the WHC-CM-7-5. This course is a prerequisite for shippers who must take this course and then continue on through Waste Management Administrative course.

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WASTE MANAGEMENT ADMINISTRATIVE

Course # 035120

(and Refresher - # 035130)

This 8-hour course is designed for employees preparing to become authorized shippers of dangerous and/or mixed waste. The class is divided into two segments. The first two hours, Part 1, covers 25 different subject areas linked by a common theme: regulatory and company policies, forms, reports, forecasts, and plans. The new shipper is presented a variety of topics and forms that he/she will have input to or be directly responsible for completing. The student is provided with a handout that outlines each subject area with a heading, purpose, references, company contacts, and scope. The handout serves as a ready reference to be used in the workplace. In addition, students also have access to reference binders in the classroom that contain examples of properly completed forms and formats discussed in each subject area.

The remainder of the course, Part 2, focuses on waste acceptance criteria at the Hanford Site. Information is provided as well as practical exercises requiring students to complete forms integral to waste handling and disposition. Topics covered include the following:

- Waste Characterization (physical, chemical, radiological)
- Waste Storage Disposal Request (with Attachments A and B).
- Low Level Waste Storage/Disposal Record
- Transuranic Waste Storage/Disposal Record
- WIPP Certification Checklist
- Radioactive Mixed Waste Attachment Sheet

In addition, students will learn and understand how these forms are needed to complete shipping papers. Hazardous Material Operations covers shipping paper requirements in their DOT coursework. The shipping papers involved are: Radioactive Shipment Record, Hazardous Material Shipping Record, and Uniform Hazardous Waste Manifest.

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FACILITY WASTE SAMPLING AND ANALYSIS

Course # 035020

This 12-hour course teaches waste sampling at operating facilities according to EPA Protocols SW-846, *Test Methods for Evaluating Solid Waste Physical/Chemical Methods*. In addition to SW-846, documentation requirements in a sampling plan, field and laboratory quality control/assurance, and manipulation of actual sampling equipment will be reviewed and utilized in a nonhazardous setting. Course materials are presented by lecture, classroom exercises, demonstration, and classroom discussion.

Topical Outline

- Overview of SW-846
- Sampling Plans
 - Use of Process Knowledge
 - Types of Information Required in a Sampling Plan
- Minimum Documentation Required
 - Logbook
 - Chain of Custody Form
 - Sample Analysis Request Sheet
- Radiation Documentation

Who Should Attend: Waste coordinators, engineers who write sampling plans, operators who perform sampling, emergency personnel, and any other personnel involved in a sampling effort will benefit from this course.

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WASTE DESIGNATION AND SUPPORT

Course # 035012 & 035010

This 12-hour course teaches dangerous waste designation according to Washington Administrative Code (WAC) 173-303. Class content includes section-by-section lecture on the regulations, with examples following each section. Students will learn to complete these examples using the Waste Designation Flowchart.

Topical Outline:

- Federal Listed Waste
 - Discarded Chemical Products
 - Dangerous Waste Source
- Washington State Criteria
 - Toxicity
 - Persistence
 - Carcinogenic
- Federal Characteristics
 - Ignitability
 - Corrosivity
 - Reactivity
 - Toxicity

Who should attend: Anyone involved in writing or changing part A and part B permits, shipping dangerous waste, and/or designating dangerous waste in accordance with WAC 173-303 should attend this course.

Prerequisite: A basic understanding of chemistry is highly recommended for this course.

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ENVIRONMENTAL REGULATIONS AT HANFORD

Course # 035040

This eight-hour course provides an overview of environmental regulations as they apply to Hanford, to help participants make informed decisions relating to environmental compliance issues. It includes information on potential legal liabilities, applicable federal and state regulations, various reporting requirements, inspections/audits and record keeping. Information is presented through lecture, video, and group participation, using Hanford examples.

Topical Outline

- Legal Perspective
- National Environmental Policy Act
- Air Emissions Management
- Clean Water Management
- Resource Conservation and Recovery Act
- Spill and Release Reporting
- Toxic Substances Control Act
- Emergency Planning and Community Right-to-Know Act Reporting
- Inspections/Audits and Record Keeping

Who Should Attend: WHC-ECM-7-5 requires WHC Environmental Compliance Officers and level 1, 2, and 3 managers to attend this course. Others who require an overview of environmental compliance requirements at Hanford should also attend.

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ENVIRONMENTAL COMPLIANCE AT HANFORD

Course # 035050

This eight-hour course provides an overview of environmental regulations and focuses on the use of Westinghouse Hanford Company's Environmental Compliance Manual (WHC-CM-7-5) to address compliance issues. Information is presented through lecture, video, workbook activities, and group participation, using Hanford examples.

Topical Outline

- Legal Perspective
- National Environmental Policy Act
- Air Emissions Management
- Clean Water Management
- Resource Conservation and Recovery Act
- Spill and Release Reporting
- Toxic Substances Control Act
- Emergency Planning and Community Right-to-Know Act Reporting
- Inspections/Audits and Record Keeping

Who Should Attend: WHC-CM-7-5 requires Westinghouse Hanford Company level 4, 5, and 6 managers to attend this course. Other WHC employees who require an overview of regulatory compliance and use of WHC-CM-7-5 should also attend.

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D.O.T. HAZARDOUS WASTE SHIPMENT CERTIFICATION

Course # 020159

This half-day course enables students to identify shipper's responsibilities and liabilities with regard to compliance to EPA and DOT Regulations, including storage, inspection, and loading requirements.

Topical Outline

- Introduction to D.O.T. Regulations
- Shippers Responsibilities
- Shippers Liabilities
- Pre-shipment inspection
- Transportation of Hazardous Materials
- Waste Minimization
- Summary of Requirements

Who Should Attend: Those employees who are involved with waste management activities and require training per WAC 173-303, and/or D.O.T. 49 CFR Parts 100-177.

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